To the Maritime Area Regulatory Authority
Application MUL260006
From [redacted]
Date 20/10/2026
Postal address [redacted]
Email [redacted]

A personal account of my love of local fishing at Cregg Beach

Dear Sir or Madam,

I have lived in Calluragh my whole life and have always benefited from the ocean and everything it has to offer because of it's close proximity, only in the last couple of years have I gotten into fishing properly which has opened my eyes to the amount of beauty and importance wildlife has specifically in an area like this, regardless whether I catch a fish or not nor if it is pouring rain or the sun is splitting the rocks, standing on the large rocks amongst the shore on cregg beach has always been such a peaceful, important and unique experience to me, I can only describe it as pure peace, feeling the crisp wind slap my face as the seals nearby sunbathe is my depiction of heaven.
To think such a perfect ecosystem of all kinds of creatures could be upheaved so dramatically makes my stomach turn. On a low tide I stand within a couple hundred of metres of where the outlet for the treatment plant's water will go. I have often caught Atlantic Sea Bass, Mackerel and Pollack on the shoreline right where the water will be affected. Sea Bass, particularly, thrive here unbeknownst to many because of the combination of sandy sea floor meeting the rocky sea floor as well as the depth of water. In the 1990s, Sea Bass population dramatically declined due to overfishing and has since then been the only species in Ireland to be protected for the sole purpose of recreational fishing, commercial fishing and all other forms are formally banned in Irish waters. In my opinion allowing such species and ecosystems to try and flourish with the challenges they already face are so important. I plea on a personal level to reconsider your plans.

Thank you.

the specialist advice already received

In its observation of 26 March 2026, IFI identified Atlantic salmon, sea lamprey and river lamprey as relevant Annex II species and drew attention to European eel. It challenged the absence of fish screening and requested that the relevant species be screened in and appropriate mitigation proposed. It also requested soft start or ramp up for all sound generating activities at daily commencement and after any stop.

The revised document

Salmon and lamprey are not named in the revised August NIS. Table 3-1 lists harbour porpoise, bottlenose dolphin and three diving bird species. This leaves a substantive question about how the IFI request was addressed. The absence of named fish does not itself establish harm, but the regulator needs a documented explanation of the relevant pathways and conclusions.

River and coastal pathways

The applicant response of 26 June 2026 states that the application also relates to the associated network pipe crossing under the Inagh River at Ennistymon (page 1), where the NIS describes kick sampling and water quality sampling (section 2.2). Fish using freshwater, estuarine and coastal environments may encounter

different parts of the programme. MARA should require the applicant to explain which investigations could affect migration, feeding or habitat, and which protections apply. Existing commitments on equipment cleaning and pollution prevention should be made operationally specific.

MARA's own inspection at Ennistymon

MARA's site inspection of Area B on 3 May 2026, released under Access to Information on the Environment (AIE_006_2026), recorded Inland Fisheries Ireland infrastructure immediately upstream at the Ennistymon Cascades, including a fish pass and a possible elver trap. European eel is listed as critically endangered in the National Biodiversity Data Centre records for the area (Annex E of CCLWAG's submission) and is subject to the EU eel recovery regulation.

How these species should be assessed

Where salmon, sea lamprey or river lamprey are qualifying interests of a European site with connectivity to Liscannor Bay, they belong in the Appropriate Assessment. Where a species is not a qualifying interest of a site in the zone of influence, I ask MARA to address it under its wider environmental duties and the advice of Inland Fisheries Ireland, rather than set it aside.

Survey noise and the Danish study

Pace, Robinson, Lumsden and Martin (2026) measured underwater sound from a Danish geophysical survey with a sparker, subbottom profiler and positioning system operating separately and together. The study estimated by extrapolation that combined-source sound would fall below 100 dB re 1 µPa, using very high frequency cetacean weighting, at about 11 km. This concerns marine mammal acoustic criteria; it is neither a fish impact distance nor a prediction for Liscannor Bay. It supports the need to assess the complete operating survey spread with site-specific acoustic evidence. MARA should require a fish-specific assessment of possible injury, disturbance, displacement or migration delay, addressing propagation towards the Inagh River mouth, fish hearing sensitivity, relevant sound pressure and particle motion, repeated exposure and migration seasons. MARA should require the applicant to assess these potential effects adequately before determination. For Appropriate Assessment, MARA must be satisfied that the proposed works will not adversely affect the integrity of the relevant European sites, with no reasonable scientific doubt remaining.

Sediment information and the permitted seasons

Attachment 4.5 acknowledges that "Sediment classification of Liscannor Bay was not available at the time of writing the report" (page 3), while anticipating negligible disturbance and no deterioration in ecological or chemical status. The applicant should explain the evidence supporting those conclusions and assess sediment resuspension, transport and deposition at sensitive receptors. The provisional winter programme does not limit the requested 24 month licence to winter. Fish migration, spawning and nursery pathways need assessment over the authorised period or justified seasonal conditions.

A relevant example of conditions

MARA recommended restrictions on vessel-based geotechnical and geophysical surveys between 1 November and 31 March in its MUL240036 assessment report (Appendix 1, condition 17, printed page 36), to protect known spawning along that route. That is a project-specific recommendation, not an automatic restriction for Liscannor Bay. It illustrates the need to establish and protect relevant local spawning periods and to engage with fishers.

Action requested from MARA

1. Request an explicit response to every material point in the IFI observation and obtain IFI advice on the revised assessment and proposed conditions.

2. Assess relevant fish pathways, including underwater noise and vibration, sediment disturbance and accidental pollution. Explain any exclusion from Appropriate Assessment by reference to the relevant European sites and their conservation objectives. Require site-specific assessment of the combined noise from survey equipment, drilling and vessels, including sound propagation towards the Inagh estuary and possible effects on fish migration and sensitive life stages.

3. Provide a map and method schedule for freshwater and estuarine investigations, with access, crossings, sampling methods and seasonal restrictions where justified.

4. Specify how soft start or ramp up will apply to each sound generating activity. Explain any proposed departure from the IFI request, including the restart requirement.

5. Include clear measures for sediment control, spill response, equipment cleaning and reporting of incidents.

6. Explain sediment assumptions and assess downstream transport and receptor exposure from Area B and other intrusive works. Consider whether preliminary characterisation or a phased programme is needed.

7. Make the stated absence of drilling muds or chemicals binding, and specify local seasonal protection and fisheries liaison justified by the assessment.

The Inagh and Ballymacraven rivers have already suffered. The 2023 fish kill is still remembered here, and local people have worked hard on the river's recovery since. [Add, in your own words, your own connection to the river, its fish or its recovery.]

I ask MARA to give the advice of Inland Fisheries Ireland the weight it deserves, to obtain what is missing before it decides, and to explain in the determination how the fish of this river system will be protected.

I also support the submission made by the Calluragh Cregg Lahinch Wastewater Action Group.

Sources supporting this submission

Inland Fisheries Ireland observation, 26 March 2026. Pages 1 and 2, species screening and operational mitigation.

Revised SISAA and Natura Impact Statement, August 2026. Table 3-1; sections 2.7.7, 3.2 and 3.3.

Applicant response to further information, 26 June 2026. Page 1, Inagh river network investigations.

Applicant Attachment 4.5, consistency with Water Framework Directive objectives. Page 3, sediment baseline and effects conclusions.

Applicant Risk Assessment for Annex IV Species, January 2026. Page 27, absence of drilling muds or chemicals.

MARA MUL240036 assessment report, EirGrid, 9 July 2025. Appendix 1, conditions 15 and 17, pages 36 to 37 as numbered in the report.

MARA site inspection report, Area B (Ennistymon), 3 May 2026, released under AIE_006_2026.

Pace, F., Robinson, C., Lumsden, E. and Martin, B. (2026). Underwater Sound Signatures from Geophysics Survey Spread: Case Study from the North Sea Energy Island, Denmark. First published 28 May 2026. Abstract, Results and Estimation of Acoustic Effects. https://link.springer.com/rwe/10.1007/978-3-031-94229-7_108-1